

**EXHIBIT "C"**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

DET DAT and THOKAT KUOTH,

Plaintiffs,

v.

THE INDEPENDENT ORDER OF  
FORESTERS,

Defendant.

Case No. 8:22-cv-00444

**DECLARATION OF KRISTA M.  
ECKHOFF IN SUPPORT OF  
DEFENDANT'S NOTICE OF REMOVAL**

I, Krista M. Eckhoff, being first duly sworn state that I am more than twenty-one (21) years of age and do not suffer from any legal disability. I have personal knowledge of and am competent to testify about the facts stated in this Declaration.

1. I am an attorney for Defendant The Independent Order of Foresters ("Defendant"), improperly named under its trade name "Foresters Financial" in the state court complaint.

2. I have reviewed Plaintiff's Complaint in this matter, and I am familiar with its allegations.

3. Plaintiffs Det Dat and Thokat Kuoth name "Foresters Financial" as Defendant, but the correct name for the company at issue is The Independent Order of Foresters. Attached hereto as Exhibit 1 is a true and correct copy of the letters patent issued by the Government of Canada showing The Independent Order of Foresters having been incorporated in Canada. Attached hereto as Exhibit 2 is a true and correct copy of a print-out of the website from the Office of the Superintendent of Financial Institutions of the Government of Canada, which regulates The Independent Order of Foresters, reflecting that The Independent Order of Foresters is a Canadian Fraternal

Benefit Society with its principal place of business in Canada. Exhibits 1 and 2 are public records provided by and/or maintained by the Government of Canada.

**I declare under penalty of perjury that the foregoing is true and correct.**

DATED this 28th day of December 2022.

/s/Krista M. Eckhoff  
Krista M. Eckhoff

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